EXHIBIT D

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

SUSAN B. LONG, ET AL.,	)	
	)	CV No. 14-109-APM
Plaintiffs,	)	
	)	Washington, D.C.
vs.	)	May 8, 2018
	)	9:57 a.m.
IMMIGRATION	)	
AND CUSTOMS ENFORCEMENTS, ET AL.,	)	Day 1
	)	
Defendants.	)	SEALED
_____	)	

TRANSCRIPT OF EVIDENTIARY HEARING
BEFORE THE HONORABLE AMIT P. MEHTA
UNITED STATES DISTRICT JUDGE

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PLAINTIFFS':

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1   information and what would be its interest to an adverse

2   attacker.

3   Q   But if that information were conveyed in a

4   spreadsheet column header in plain English as opposed to in

5   the form of an abbreviation underbar status, does that

6   create a threat that is unacceptable?

7   A   As an attempt to mitigate that threat by not using

8   the actual field name, but, instead, using a plain-language

9   description of the data that we're responding with.

10   Q   Is any knowledge with respect to the contents of

11 your database, is that a threat?

12   A   Any knowledge?

13   Q   Any knowledge. Any release of information about

14 what's in your database, does that constitute a threat?

15   A   No. It's -- the contents of our database are

16 subject to FOIA, and we've produced data from our database

17 for that reason.

18   Q   And where do you draw the line between what kind

19 of information is an unacceptable threat and what kind of

20 information is acceptable?

21   A   When it describes the organization of our data and

22 the structure of our databases.

23   Q   Is any information about the organization and

24 structure of your database an unacceptable threat?

25   A   I don't know what you're getting at.

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 1        Q     Well, if you produce a table of -- a spreadsheet

 2   that lists, let's say, information about detainers and it

 3   has a column heading that says, "Detainer issue date," that

 4   reveals to someone, does it not, that your database contains

 5   fields of information that that heading describes, right?

 6        A     It does.

 7        Q     And that doesn't pose an unacceptable risk?

 8        A     No.

 9        Q     And if that happens to be the actual name of a

10   field from the IIDS with spaces replacing underscores, does

11   it, then, create an unacceptable risk?

12        A     I don't think so, no.  Not in that example.

13        Q     I'd like to ask you about the codes that are found

14   in some fields in the database.

15              Tell me what you mean by a "code."

16        A     A "code" is a shortened string of information

17   meant to link to more expanded bits of information.

18        Q     And the code is an entry within a field in the

19   database, right?

20        A     Correct.

21        Q     And somewhere, there's a translation of what that

22   code means that allows somebody to understand it, correct?

23        A     Yes.  Typically, there's a description for the

24   code.

25        Q     And let me show you what's been marked as
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